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Attorney for Plaintiff and Counterclaim Defendant Saipan Handicraft

**IN THE UNITED STATES DISTRICT COURT
FOR THE
THE NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,) CIVIL ACTION No. 05-0040

Plaintiff)

)

v.)

)

MICRONESIA WOODCRAFT, ENT., INC.,) DECLARATION OF COUNSEL

TIRZO J. ADRIATICO, individually and as)

President of Micronesia Woodcraft, Inc., and)

JOHN DOES 1 - 40)

)

Defendants.)

)

I, Kelley M. Butcher, hereby declare as follows:

1. On July 18, 2007, this office entered it's notice of appearance as council for plaintiff in the above entitled matter. At that time no Case Management Conference was set in this matter.
2. In reviewing the pleadings, motions, prior orders from this Court, and other documents from this case file Counsel mistakenly believed that the Court would be issuing an order setting a new Case Management Conference.
3. The last Case Management Conference set in this matter was conducted on February 14,

2006. At that time the Court issued its scheduling order which set trial in this case for October 23, 2006. Subsequent to that order, on June 29, 2006, the parties in this matter stipulated to vacate the Case Management Scheduling Order. In adopting that stipulation, the Court vacated the Case Management Conference Order and stated "Parties will be notified of the new schedule." See June 29 Stipulation and Order Attached hereto. Counsel erroneously took that to mean that this Court would set a new Case Management Conference date.

4. Counsel apologizes to this Court for not taking affirmative action to set this matter on the Court's calendar. Counsel is filing a Request to Set Case Management Conference at this time. Counsel respectfully request that the Court entertain this motion and allow a new Case Management Conference to be set in this matter.
5. Counsel understands the importance of the Court's need to maintain the integrity of its calendar and in no way intended to hinder moving this case forward. The above matter is voluminous and Counsel has been working diligently since receiving charge of this matter to become familiar with the case file.
6. Counsel assures this Court that should any future dates and/or deadlines be set in this matter, they will be adhered to strictly.

Respectfully Submitted this 29th day of October,

Law Office of G. Anthony Long

By: _____ /s _____
Kelley M. Butcher